

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

1201 NORTH MARKET STREET
P.O. Box 1347
WILMINGTON, DELAWARE 19899-1347

302 658 9200
302 658 3989 FAX

THOMAS C. GRIMM
302 351 9595
302 425 4661 FAX
tgrimm@mnat.com

August 7, 2008

PUBLIC VERSION

BY E-FILING, E-MAIL & HAND DELIVERY

DM2

The Honorable Vincent J. Poppiti
Blank Rome, LLP
1201 Market Street, Suite 800
Wilmington, DE 19801

Confidential Version Filed: August 7, 2008
Public Version Filed: August 25, 2008

Re: *Honeywell International Inc., et al. v. Apple Computer, Inc., et al.*
C.A. No. 04-1338-JJF (Consolidated)

Dear Judge Poppiti:

In response to Your Honor's request, please find information clarifying Honeywell's use of the term "hits" under Heading 1, Page 3, of its July 18, 2008 submission.

This particular issue is one of the three variants that were identified by Mr. Woods in the teleconference on July 30, 2008. The use of the term "hits" is a colloquial term for instances wherein Honeywell's internal investigation has identified potential infringement. The specific instances referred to on Page 3 refer to a series of communications last year to certain Customer Defendants identifying such instances, most often in circumstances where Honeywell could not discern the identity of the supplier of the LCD module; *i.e.*, Honeywell identified the end product, but the LCD supplier remained unknown. In keeping with what Honeywell understood was the Customer Defendants' obligation under Judge Jordan's Order of October 7, 2005, Honeywell asked the Customer Defendants to identify the module suppliers for the accused product. Honeywell communicated with counsel for the following Customer Defendants as follows:

CUSTOMER DEFENDANT	DATE OF COMMUNICATION	PRODUCTS
Audiovox ¹	August 29, 2007	SMT5600, CDM8910
Argus	August 29, 2007	DC1730

¹ There is some question as to whether these products are associated with Audiovox AEC or Audiovox ACC.

The Honorable Vincent J. Poppiti
August 7, 2008
Page 2

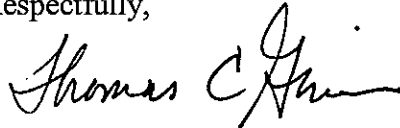
CUSTOMER DEFENDANT	DATE OF COMMUNICATION	PRODUCTS
Kyocera	August 29, 2007	7135
Matsushita	August 29, 2007	GD88, X700
Nokia	August 31, 2007	1600
Sanyo	August 29, 2007	SCP200, VI2300, SCP5300
Sony Ericsson	September 17, 2007	T290
Sony ²	March 7, 2007	S710A, S700I

Attached hereto are copies of the letters which Honeywell sent to these individual defendants.

In addition, in January 2007, in a series of telephone conversations with counsel for Apple, Honeywell raised its concerns about whether any of the specifically accused Optrex modules were being used in Apple's iPod product, given numerous industry references to Optrex being a supplier of LCD modules for Apple's iPod.

We trust that this provides the requested clarification. Please let us know if Honeywell can provide additional information on this issue.

Respectfully,



Thomas C. Grimm (#1098)

TCG

Enclosures

cc: Dr. Peter T. Dalleo, Clerk (by hand, w/encls.)
All Counsel of Record (by e-filing and/or e-mail, w/encls)
(see attached Certificate of Service)

² In subsequent communications, it appears that these products may actually be manufactured by Sony Ericsson, not Sony.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on August 25, 2008, the foregoing was caused to be electronically filed with the Clerk of the Court using CM/ECF which will send electronic notification of such filing to all registered participants.

In addition, the undersigned hereby certifies that true and correct copies of the foregoing were caused to be served via electronic mail on August 25, 2008 upon the following parties:

REPRESENTING HONEYWELL INTERNATIONAL INC.
AND HONEYWELL INTELLECTUAL PROPERTIES INC.

(C.A. 04-1337)

Steven J. Balick
sbalick@ashby-geddes.com

John G. Day
jday@ashby-geddes.com

Lauren E. Maguire
lmaguire@ashby-geddes.com

REPRESENTING AUDIOVOX ELECTRONICS
CORPORATION

(C.A. 04-1337)

William F. Taylor, Jr.
wtaylor@mccarter.com

REPRESENTING AUDIOVOX COMMUNICATIONS CORP.

(C.A. 04-1337)

Matt Neiderman
mneiderman@duanemorris.com

D. Joseph English
djenglish@duanemorris.com

REPRESENTING NIKON CORPORATION
AND NIKON INC.

(C.A. 04-1337)

Richard L. Horwitz
rhorwitz@potteranderson.com

David E. Moore
dmoore@potteranderson.com

Barry W. Graham
barry.graham@finnegan.com

Darren M. Jiron
darren.jiron@finnegan.com

REPRESENTING NOKIA CORPORATION
AND NOKIA INC.

(C.A. 04-1337)

Thomas L. Halkowski
halkowski@fr.com

William J. Marsden, Jr.
marsden@fr.com

Lauren A. Degnan
degnan@fr.com

Andrew R. Kopsidas
kopsidas@fr.com

REPRESENTING SAMSUNG SDI CO., LTD.
(THIRD-PARTY DEFENDANT)

(C.A. 04-1337)

Richard L. Horwitz
rhorwitz@potteranderson.com

David E. Moore
dmoore@potteranderson.com

Alana A. Prills
alanaprills@paulhastings.com

Carolyn E. Morris
carolynmorris@paulhastings.com

Elizabeth L. Brann
elizabethbrann@paulhastings.com

Hamilton Loeb
hamiltonloeb@paulhastings.com

Stephen S. Korniczky
stephenkorniczky@paulhastings.com

REPRESENTING SANYO ELECTRIC CO., LTD.
AND SANYO NORTH AMERICA

(C.A. 04-1337)

Richard L. Horwitz
rhorwitz@potteranderson.com

David E. Moore
dmoore@potteranderson.com

Michael A. Dorfman
Michael.dorfman@kattenlaw.com

Timothy J. Vezeau
timothy.vezeau@kattenlaw.com

Richard P. Bauer
richard.bauer@kattenlaw.com

REPRESENTING SEIKO EPSON CORPORATION

(C.A. 04-1337)

Robert J. Katzenstein
rjk@skfdelaware.com

Robert J. Benson
rjbenson@hhlaw.com

REPRESENTING APPLE

(C.A.04-1338)

Thomas L. Halkowski
halkowski@fr.com

Kelly C. Hunsaker
hunsaker@fr.com

Frank E. Scherkenbach
scherkenbach@fr.com

REPRESENTING ARGUS/HARTFORD

(C.A.04-1338)

Richard H. Cross, Jr.
rcross@crosslaw.com

Amy Evans
aevans@crosslaw.com

Brian D. Roche
broche@reedsmith.com

Michael P. Bregenzer
mbregenzer@reedsmith.com

REPRESENTING CASIO

(C.A.04-1338)

Thomas L. Halkowski
halkowski@fr.com

John T. Johnson
jjohnson@fr.com

REPRESENTING CITIZEN WATCH CO., LTD.
AND CITIZEN DISPLAYS CO., LTD.

(C.A.04-1338)

David J. Margules
dmargules@bmf-law.com

Stuart Lubitz
slubitz@hhlaw.com

David H. Ben-Meir
dhben-meir@hhlaw.com

Rose Hickman
rahickman@hhlaw.com

REPRESENTING CONCORD CAMERA

(C.A.04-1338)

Richard L. Horwitz
rhorwitz@potteranderson.com

David E. Moore
dmoore@potteranderson.com

REPRESENTING DELL

(C.A.04-1338)

Richard L. Horwitz
rhorwitz@potteranderson.com

David E. Moore
dmoore@potteranderson.com

Avelyn M. Ross
aross@velaw.com

Willem G. Schuurman
bschuurman@velaw.com

Roderick B. Williams
rickwilliams@velaw.com

REPRESENTING EASTMAN KODAK

(C.A.04-1338)

Frederick L. Cottrell, III
cottrell@rlf.com

Chad M. Shandler
shandler@rlf.com

Neal Slifkin
nslifkin@harrisbeach.com

Paul J. Yesawich, III
pyesawich@harrisbeach.com

Laura W. Smalley
lsmalley@harrisbeach.com

REPRESENTING FUJIFILM CORPORATION
AND FUJIFILM U.S.A., INC.

(C.A.04-1338)

Philip A. Rovner
provner@potteranderson.com

Angie M. Hankins
ahankins@stroock.com

Matthew W. Siegal
msiegal@stroock.com

Lawrence Rosenthal
lrosenthal@stroock.com

REPRESENTING FUJITSU

(C.A.04-1338)

Richard L. Horwitz
rhorwitz@potteranderson.com

David E. Moore
dmoore@potteranderson.com

Christopher E. Chalsen
cchalsen@milbank.com

Christopher J. Gaspar
cgaspar@milbank.com

REPRESENTING HOYA (FORMERLY PENTAX)

(C.A.04-1338)

Adam W. Poff
apoff@ycst.com

Michael J. Fink
mfink@gbpatent.com

Neil F. Greenblum
ngreenblum@gbpatent.com

P. Branko Pejic
bpejic@gbpatent.com

REPRESENTING INNO LUX DISPLAY CORPORATION

(C.A.04-1338)

Matt Neiderman
mneiderman@duanemorris.com

Donald R. McPhail
drmcpail@duanemorris.com

REPRESENTING KYOCERA

(C.A.04-1338)

Robert J. Katzenstein
rjk@skfdelaware.com

Robert K. Beste, III
rkb@skfdelaware.com

Stuart Lubitz
slubitz@hhlaw.com

David H. Ben-Meir
dhben-meir@hhlaw.com

Rose Hickman
rahickman@hhlaw.com

REPRESENTING MEI/MEC (MATSUSHITA)
(C.A.04-1338)

William J. Wade
wade@rlf.com

Steven A. Reiss
steven.reiss@weil.com

David J. Lender
david.lender@weil.com

REPRESENTING NAVMAN
(C.A.04-1338)

Arthur G. Connolly, III
aconnollyIII@cblh.com

Brian M. Gottesman
bgottesman@cblh.com

Bradford P. Lyerla
blyerla@marshallip.com

REPRESENTING OLYMPUS
(C.A.04-1338)

John W. Shaw
jshaw@ycst.com

Monté Squire
msquire@ycst.com

Richard M. Rosati
rrosati@kenyon.com

George E. Badenoch
gbadenoch@kenyon.com

REPRESENTING OPTREX
(THIRD-PARTY PLAINTIFF)
(C.A.04-1338 AND 04-1536)

Karen L. Pascale
kpascale@ycst.com

Thomas J. Fisher
tfisher@oblon.com

Alexander E. Gasser
agasser@oblon.com

Richard D. Kelly
rkelly@oblon.com

Andrew M. Ollis
aollis@oblon.com

John F. Presper
jpresper@oblon.com

REPRESENTING SAMSUNG SDI CO., LTD.
AND SAMSUNG SDI AMERICA, INC.

(C.A.04-1338)

Richard L. Horwitz
rhorwitz@potteranderson.com

David E. Moore
dmoore@potteranderson.com

Alana A. Prills
alanaprills@paulhastings.com

Carolyn E. Morris
carolynmorris@paulhastings.com

Elizabeth L. Brann
elizabethbrann@paulhastings.com

Hamilton Loeb
hamiltonloeb@paulhastings.com

Stephen S. Korniczky
stephenkorniczky@paulhastings.com

REPRESENTING SONY CORPORATION

(C.A.04-1338)

John W. Shaw
jshaw@ycst.com

Monté Squire
msquire@ycst.com

John Flock
jflock@kenyon.com

Robert L. Hails, Jr.
rhails@kenyon.com

Michael M. Shen
mshen@kenyon.com

REPRESENTING SONY ERICSSON

(C.A.04-1338)

Francis DiGiovanni
fdigiovanni@cblh.com

REPRESENTING TOSHIBA
(C.A.04-1338)

Richard L. Horwitz
rhorwitz@potteranderson.com

David E. Moore
dmoore@potteranderson.com

Arthur I. Neustadt
aneustadt@oblon.com

Carl E. Schlier
cschlier@oblon.com

/s/ Thomas C. Grimm

Thomas C. Grimm (#1098)